

United States Courts
Southern District of Texas
FILED

FEB 19 2019

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS.

CRIMINAL NO.

**GARY SHAWN HAYNES, Jr. aka “TSF Gee”,
JAIMIAN RASHAAD SIMS aka “Sauce Lean”,
TABBETHA DESTINY ANN MANGIS,
and
DESZMANN BROUSSARD
aka “Lucciani Saucy”,
Defendants.**

4:18CR-455

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Commit Sex Trafficking)

From on or about October 1, 2017, through March 31, 2018, in the Southern District
of Texas and elsewhere,

**GARY SHAWN HAYNES, Jr. aka “TSF Gee”,
JAIMIAN RASHAAD SIMS aka “Sauce Lean”,
TABBETHA DESTINY ANN MANGIS,
DESZMANN BROUSSARD aka “Lucciani Saucy”,**

conspired and agreed with each other, and others known and unknown to the Grand Jury, to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means, and benefited financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means, any persons knowing and in reckless disregard for the fact that means of force, fraud, and

coercion would be used to cause these persons to engage in commercial sex acts and that the persons, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and that the persons would be caused to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1594(c), 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c).

COUNT TWO
(Sex Trafficking of Minors)

From on or about October 1, 2017, through November 24, 2017, in the Southern District of Texas and elsewhere,

**GARY SHAWN HAYNES, Jr. aka “TSF Gee”,
JAIMIAN RASHAAD SIMS aka “Sauce Lean”,**

defendants herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as Jane Doe, who had attained the age of 14, but was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Jane Doe, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Jane Doe to engage in a commercial sex act, and that (2) Jane Doe, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex.

In violation of Title 18, United States Code, Section 1591(a), (b), (c) and Section 2.

COUNT THREE
(Sex Trafficking by Force, Fraud or Coercion)

From on or about October 1, 2017, through March 31, 2018, in the Southern District of Texas and elsewhere,

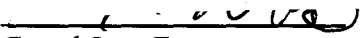
JAIMIAN RASHAAD SIMS aka "Sauce Lean",

defendants herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a female known as Janet Doe, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Janet Doe, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Janet Doe to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a), (b)(1), and Section 2.

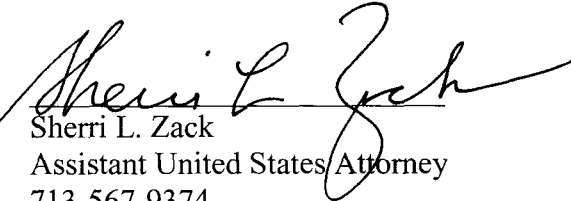
A True Bill:

ORIGINAL SIGNATURE ON FILE


Grand Jury Foreperson

RYAN K. PATRICK
United States Attorney

By:


Sherri L. Zack
Assistant United States Attorney
713-567-9374